



ROBINSON MCFADDEN
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.

COLUMBIA | GREENVILLE

May 6, 2005

VIA EMAIL & HAND DELIVERED

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Frank R. Ellerbe, III
1901 MAIN STREET, SUITE 1200
POST OFFICE BOX 944
COLUMBIA, SOUTH CAROLINA 29202

PH
(803) 779-8900 | (803) 227-1112 *direct*
FAX
(803) 252-0724 | (803) 744-1556 *direct*
fellerbe@robinsonlaw.com

**Re: Time Warner Cable Information Services (SC), LLC
Docket No. 2004-280-C – Rural ILEC Service Areas
Our File No. 03027-0065**

Dear Mr. Terreni:

Enclosed for filing please find the proposed order of Time Warner Cable Information Services (SC), LLC in the above referenced docket. We will also submit two electronic versions, one in adobe format for posting to the website which will be served on all interested parties and one in Word format to Mr. Melchers so that it can be modified as the Commission deems appropriate. Please stamp the extra copy provided as proof of filing and return it with our courier. Should you have any questions please contact me.

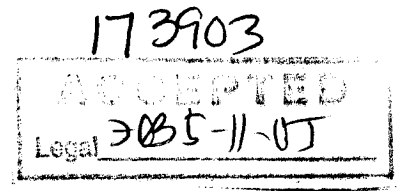
Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/bds
Enclosure
cc/enc:

Joseph Melchers, Chief Counsel (via email & U.S. Mail)
Julie Y. Patterson, Esquire (via email & U.S. Mail)
Ms. Charlene Keys (via email & U.S. Mail)
Florence P. Belser, Esquire (via email & U.S. Mail)
Benjamin P. Mustian, Esquire (via email & U.S. Mail)
Dan F. Arnett, Chief of Staff (via email & U.S. Mail)
M. John Bowen, Jr., Esquire (via email & U.S. Mail)
Margaret M. Fox, Esquire (via email & U.S. Mail)
Ms. Daphne Werts (via email)



BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Docket No. 2004-280-C – Order No. 2005-

May _____, 2005

IN RE: Application of Time Warner Cable Information Services (South Carolina), LLC, d/b/a Time Warner Cable to Amend its Certificate of Public Convenience and Necessity to Provide Interexchange and Local Voice Services in Service Areas of Certain Incumbent Carriers who Currently Have a Rural Exemption)
)
) ORDER GRANTING
) AMENDMENT TO
) CERTIFICATE
)

Prior to the passage of the Telecommunications Act of 1996 (“Telecom Act”), 47 U.S.C. Section 251 *et seq.*, telephone service was a regulated monopoly in which incumbent providers enjoyed protection from new companies entering the market. *Southwestern Bell Telephone Co. v. Apple*, 309 F.3d 713, 715 (10th Cir. 2002). The Telecom Act fundamentally restructured local telephone markets by providing that states could no longer enforce laws that impede competition and by providing that incumbent local exchange carriers are subject to a host of duties intended to facilitate market entry by competitive local exchange carriers (“CLECs”). *AT&T Corp. v. Iowa Utilities Board*, 525 U.S. 366, 371, 119 S. Ct. 721, 142 L.Ed.2d 835 (1999). In recognition of this fundamental change, the South Carolina General Assembly in 1996 rewrote the statutory requirements for becoming a certificated local exchange carrier. The new S.C. Act specifically indicated that the Public Service Commission of South Carolina (“Commission”) could not act in any manner that would be *inconsistent with the federal Telecommunications Act of 1996* when determining whether to grant a certificate of public convenience and necessity. S.C. Code § 58-

9-280(B). Consistent with this statutory mandate and because the Applicant in this case has made all of the required showings, the Commission grants the Application of Time Warner Cable Information Services (South Carolina), LLC, d/b/a Time Warner Cable, ("TWCIS") to expand the geographic scope of its previously granted certificate of public convenience and necessity.

PROCEDURAL BACKGROUND

This matter comes before the Commission on the Application of TWCIS to expand its scope of authority to provide competitive local exchange services in the service areas of Farmers Telephone Cooperative, Inc. ("Farmers Telephone"); Fort Mill Telephone Company, d/b/a Comporium Communications, Inc. ("Ft. Mill Telephone"); Home Telephone Company, Inc. ("Home Telephone"); PBT Telecom, Inc. ("PBT"); and St. Stephen Telephone Company (St. Stephen") (collectively "the rural ILECs"). Pursuant to Order No. 2004-213, TWCIS is currently authorized to offer interexchange services to customers throughout the State and local telecommunications services to customers in areas of South Carolina where the incumbent local exchange telephone company currently does not have a rural exemption under 47 U.S.C. § 251(f)(1). In Docket No. 2003-362-C, Order No. 2004-495, TWCIS was authorized to operate under an alternative regulatory plan under S.C. Code Sections 58-9-575 and 58-9-585 and seeks to operate under the same regulatory scheme in the rural ILECs' service areas.

TWCIS applied to provide the same services in the rural ILECs' service area that are provided in its current service area. In its certificated service area, TWCIS currently provides facilities-based Internet Protocol ("IP") voice service to customers that is offered on a bundled-flat rate basis and allows standard local calling in addition to operator services, directory assistance, enhanced "911" services, outbound 800 toll free calling, customer calling features

such as call waiting, caller identification, and directory listings.

TWCIS notes that the information on the TWCIS' financial, technical and managerial ability filed in the original application remains materially unchanged since it was filed in 2003. TWCIS also notes that in Order No. 2004-213 the Commission concluded that the TWCIS is financially qualified and that TWCIS possesses sufficient managerial and technical resources to provide telecommunications services and be certificated by the Commission. In addition, TWCIS seeks the same limited waivers it was granted in Order No. 2004-213.

Pursuant to the instructions of the Commission's Docketing Department, TWCIS published notice of its filing of the Application in area newspapers. Subsequently, the rural ILECs and the South Carolina Telephone Coalition ("SCTC") intervened in the matter.

A hearing in this docket was held on March 31, 2005. TWCIS was represented by Frank R. Ellerbe, III, and Bonnie D. Shealy. TWCIS presented the testimony of Julie Y. Patterson.

The rural ILECs and SCTC were represented by M. John Bowen, Jr. and Margaret Fox. The rural ILECs and SCTC jointly presented the testimony of H. Keith Oliver and Emmanuel Staurulakis.

The Office of Regulatory Staff ("ORS") was represented by Benjamin P. Mustian and Carolyn "Lessie" Hammonds. ORS presented no witnesses.

SUMMARY OF TESTIMONY

JULIE Y. PATTERSON

TWCIS presented the direct testimony of Julie Y. Patterson, Vice President and Chief Counsel, Telephony for Time Warner Cable. Ms. Patterson is responsible for the legal and regulatory affairs relating to TWCIS' deployment of Voice Over IP services and regulated

telecommunications services throughout the country. Ms. Patterson presented evidence on the financial, technical, and managerial abilities of TWCIS to provide local services in ILEC's service area in South Carolina. Tr. 14-15. She also described the services that TWCIS proposes to offer in the rural ILECs' service areas and how TWCIS would proceed with future tariff filings as a result of the Federal Communications Commission's recent ruling regarding the regulatory status of VoIP-based services.¹ Tr. 16.

Ms. Patterson testified that TWCIS continues to rely on the same officers identified in the initial certification docket. She also testified as to the managerial and technical experience of the local employees headed by Charlene Keys, Vice President & General Manager of General Phone. Ms. Patterson noted that Time Warner Cable maintains a relationship with TWCIS whereby Time Warner Cable provides the funding, financing, and capital necessary to provide services to customers in the expanded service areas. Tr. 14-15.

Ms. Patterson testified that TWCIS intends to begin offering services in the rural ILECs' service areas once it obtains an interconnection agreement directly with the rural ILECs or through its relationship with TWCIS' interconnecting carrier, MCI. Tr. 17-18, 94. She testified that TWCIS seeks to become a fully regulated CLEC carrier in the rural ILECs' service areas

¹ During the pendency of this Application, the Federal Communications Commission addressed the question of whether Voice Over IP based services are subject to state and/or federal regulation *In the Matter of Vonage Holdings Corporation's Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission*, WC Docket No. 03-211, Memorandum Opinion and Order, FCC 04-267, released November 12, 2004 ("Vonage Order"). In the Vonage Order, the Commission ruled that certain types of VoIP-based services are subject to preemption of state certification, tariffing, and other related state regulatory requirements. Ms. Patterson testified that this change in the current law affects the regulation of the retail VoIP based services offered under its tariff and that, consistent with the FCC's ruling in the Vonage Order, TWCIS intends to revise its tariff in accordance with the Commission's normal tariffing procedures. TWCIS has not yet filed its amended tariff and issues related to the future changes that TWCIS intends to make to its tariff are not before the Commission in this proceeding. Despite amending its retail tariff as a result of the Vonage Order, TWCIS will continue to comply with all applicable rules and statutes relating to the collection and payment of universal service fund contributions, 911 services and surcharges, and other reporting and regulatory fee requirements. Tr. 6, 25, 29-31, 62-63.

through this application so that it will have the right, pursuant to the Telecom Act, to obtain this interconnection. Tr. 29 -30, 34-36, 62-64.

Ms. Patterson emphasized that the current proceeding relates only to certification and authorization to provide service and that TWCIS is not at this time seeking to pierce the rural exemption of the rural ILECs and has not not made a bona fide request for interconnection under 47 U.S.C. Section 251(c). Tr. 18, 130. As Ms. Patterson explained, through the current proceeding, TWCIS seeks authority to offer local telecommunications services and will comply with all rules, statutes, and requirements applicable to such services.

With regard to the facilities to be used to provide the proposed services, Ms. Patterson states that TWCIS will predominantly use the facilities of its affiliate, Time Warner Cable, to provide the local services proposed. In order to complete calls destined for end users not served by Time Warner Cable, TWCIS will utilize its relationships with competitive local exchange carriers who provide to TWCIS a variety of services, including the termination of local and toll calls, the provision of directory assistance and operator services, and the delivery of 911 calls. TWCIS currently has an agreement for MCI to carry its traffic over the public switched telephone network in South Carolina. Tr. 17-18. In addition, Ms. Patterson testified that TWCIS intends to begin negotiating directly with local exchange carriers for its own interconnection, exchange and commercial agreements. Tr. 18 & 74.

Ms. Patterson testified that the issuance of an amended certificate to TWCIS would be in the public interest in that competition will be further increased in South Carolina. Competition serves the public interest by bringing about increased innovation, lower rates, improved quality of service, and enhanced services. Amending the certificate will increase facilities based and intermodal competition in the South Carolina market, as well as promote the use of new

technologies. In addition, TWCIS has made a significant investment in South Carolina and provides employment opportunities for South Carolina residents. Tr. 21 26, 101-102.

EMMANUEL STAURULAKIS

The SCTC and rural ILECs presented the testimony of Emmanuel Staurulakis, the President of John Staurulakis, Inc. Mr. Staurulakis' testimony focused on whether TWCIS' application met the public interest standard. Tr. 141. He also expressed his opinion concerning the effect of the Vonage Order upon the retail services currently provided by TWCIS and the services proposed in TWCIS' current application. Tr. 136-137. He indicated that in order to arbitrate an interconnection agreement with the rural ILECs, an entity must be a certificated carrier. Tr. 161. He also indicated that a certificated carrier must first make a bona fide request for interconnection before the rural companies can assert their rural exemption under Section 251 of the Telecom Act and that certification alone does not take away the rural companies' rural exemption. Tr. 166-167. Certification also does not affect a rural company's opportunity to come before the Commission seeking protection from other obligations imposed by the Telecom Act. Tr. 167.

Mr. Staurulakis acknowledged that the rural ILECs have faced competition in their service areas from wireless carriers, but stated that none of that competition has to date caused the rural ILECs to seek a local rate increase from the Commission. Tr. 167-168. In addition, he testified that several rural companies have given up their rural exemptions and, in those cases, the companies have similarly not sought rate increases. Tr. 171-172. Mr. Staurulakis indicated that the rural ILECs have carrier of last resort obligations and that he was not aware that any other company would have such an obligation. Tr. 169. He also testified that the FCC has taken the position that a CLEC is not required to build out an entire ILEC service area. Tr. 170.

H. KEITH OLIVER

The SCTC and rural ILECs also presented the direct testimony of H. Keith Oliver, Vice-President Finance of Home Telephone Co., Inc. Mr. Oliver testified about the impact of competition upon the rural ILECs and why he believes that the Commission should treat TWCIS differently than other similarly situated CLEC applicants. Tr. 196 & 208. Mr. Oliver testified that, prior to the filing of the current application of TWCIS, the SCTC had entered into a stipulation with all other CLEC applicants. These stipulations provided that, in exchange for the CLEC Applicants' agreement to provide advance notice to the Commission and the rural company prior to offering services in that company's area, the SCTC would not oppose the CLEC application for certification. Tr. 207-208. The SCTC has agreed with other CLECS on the stipulation primarily because the other CLEC applicants had no facilities within the rural areas and, therefore, did not have the actual capability to provide service:

- Q. So, you don't have an objection to a company being certified on a statewide basis as long as you don't think that company's ever going to actually come in and compete with you?
- A. I guess that kind of goes on its surface. Why would you be opposed to that in that situation?
- Q. The Coalition has entered into these stipulations by which all CLECs prior to this application have been allowed to get a statewide certification, correct, sir?
- A. Correct, but again, a stipulation that says they will not provide service in those rural areas.
- Q. Until they give you notice?
- A. Correct.

Tr. 208, l. 9-21.

Mr. Oliver also testified about the entry of the rural ILECs into other ILECs' service areas and described how the rural ILECs' affiliated CLEC entities generally target specific areas within the BellSouth and Verizon service areas. Tr. 210-213. He also discussed the

Commission's Order No. 2002-166, which allowed PBT Communications' to expand its facilities into the ALLTEL service area. This order allowed a rural ILEC to extend its services into a portion of the service territory of another rural ILEC. Tr. 214-215 and Hearing Exhibit 5.

In addition, Mr. Oliver indicated that wireless companies were currently providing a competitive alternative to customers in the rural ILECs' service areas and that the competition had not caused the rural ILECs to seek any rate increases from the Commission. Tr. 217-218. In fact, the rural ILECs have been able to upgrade their facilities during this period of increased competition from wireless carriers so that they are able to offer broadband services and cable television video services. Tr. 218-222. Mr. Oliver testified that Home Telephone does not serve every customer with cable television because it is not profitable to do so. Tr. 222, l. 20-21.

FINDINGS OF FACT

After carefully considering the evidence, including the testimony and exhibits presented in this docket, the Commission makes the following finding of fact:

1. TWCIS has submitted an application to amend its Certificate of Public Convenience and Necessity to serve customers throughout the rural ILECs' service areas in South Carolina.
2. TWCIS is currently authorized to offer interexchange services to customers throughout the State and local telecommunications services to customers in areas of South Carolina where the incumbent local exchange telephone company does not have a rural exemption under 47 U.S.C. § 251(f)(1).
3. It is appropriate for TWCIS to continue to operate under the alternative regulatory plan under S.C. Code §§ 58-9-575 and 58-9-585 approved in Order No. 2004-495.

4. TWCIS has substantially the same financial, managerial, and technical resources as presented during its initial certification hearing.

5. TWCIS continues to meet all statutory requirements for the provision of service as a CLEC as delineated in S.C. Code Ann. Section 58-9-280 (Supp. 2004).

6. The Commission finds that TWCIS' "provision of service will not adversely impact the availability of affordable local exchange service." S.C. Code Ann. § 58-9-280(B)(3) (Supp. 2004). The rural ILECs and the SCTC would have the Commission bar competitive entry into their service areas while their affiliates continue to expand into the service areas of rural carriers and BellSouth. The Commission cannot award the rural ILECs the ultimate competitive advantage that they seek—preservation of monopoly status—without violating the Telecom Act's prohibition against maintaining barriers to entry in violation of 47 U.S.C.A. Section 253. *RT Communications, Inc. v. FCC*, 201 F.3d 1264, 1268 (10th Cir. 2000).

7. The Commission finds that TWCIS will support universally available telephone service at affordable rates. Ms. Patterson emphasized that TWCIS will comply with all USF requirements.

8. The Commission finds that the services to be provided by TWCIS will meet the service standards of the Commission. S.C. Code Ann. § 58-9-280(B)(5) (Supp. 2004).

9. The Commission finds that the provision of local exchange service by TWCIS "does not otherwise adversely impact the public interest." S.C. Code § 58-9-280(B)(5) (Supp. 2004). First, this proceeding is limited to this public interest test in the context of granting the certification proposed by TWCIS; it does not address the issue whether interconnection between TWCIS and the rural ILECs will affect the public interest. Additionally, the Commission is not persuaded by the rural ILECs' and SCTC's arguments that the introduction of competition into

their service areas will adversely impact the public interest. Section 58-9-280(B)(5) of the South Carolina Code must be read in conjunction with the provisions of the federal Telecom Act that prevent this Commission from maintaining barriers to entry. The rural ILECs currently face competition from wireless providers in their services areas. None has sought a rate increase as a result of declining revenues from this competition. The state and federal Universal Service Funds were established in order to provide support to carriers of last resort, such as the rural ILECs, who are required to serve all customers within their service areas. Order No. 98-322, p. 26.

CONCLUSIONS OF LAW

Based upon the foregoing findings of fact, the Commission concludes, as a matter of law, the following:

10. The Commission has jurisdiction over this matter pursuant to S.C. Code Ann. Section 58-9-280.

11. TWCIS continues to meet all statutory requirements for the provision of service as a CLEC as delineated in S.C. Code Ann. Section 58-9-280(B) (Supp. 2004). Accordingly, TWCIS meets the statutory requirements to provide service in the proposed expanded service area. The testimony of Ms. Patterson supports this conclusion.

12. The Commission concludes that approval of TWCIS' application will serve the public interest by enhancing competition in the State of South Carolina. The goals of both the state and federal telecommunications acts are to embrace and increase competition in the communications marketplace. Based on the testimony and evidence presented, the Commission concludes that competition serves the public interest by bringing about increased innovation, lower rates, improved quality of service, and enhanced services.

13. The Commission concludes that the expansion of TWCIS' service area will not adversely impact the public interest. The Telecom Act abolished exclusive franchises in favor of competition and removed "the outdated barriers that protect monopolies from competition and affirmatively promote efficient competition." *Southwestern Bell Telephone Co. v Apple*, 309 F.3d 713 (10th Cir. 2002). The federal Telecom Act prohibits an outright ban of competition and bans states from impeding competition. *AT&T v. Iowa Utilities*, 525 U.S. at 371, see 47 U.S.C. § 253(a). Although Congress chose to protect rural telephone companies by exempting them from certain interconnection obligations imposed under 47 U.S.C. Section 251, it did not provide for rural telephone companies' protection from a competitors' entry into the market through the state certification process.

Section 251 imposes three sets of obligations upon telecommunications carriers that are related to interconnection.

- (a) All carriers have the duty to interconnect directly or indirectly with the facilities of other telecommunications carriers and not to install network features, functions or capabilities that do not comply with the established guidelines and standards. 47 U.S.C. §251(a).
- (b) All local exchange carriers have certain duties related to resale, number portability, dialing parity, access to rights-of-way, and reciprocal compensation. 47 U.S.C. § 251(b).
- (c) Incumbent local exchange carriers have additional duties related to negotiating in good faith the terms and agreements needed to fulfill the duties outlined in section (b); to providing interconnection with its local network; to providing unbundled access; to offering telecommunications services for resale at wholesale rates; to providing reasonable public notice of changes necessary to transmit and route services; and to providing physical collocation of equipment. 47 U.S.C.A. § 251(c).

The Telecom Act clearly provides that states cannot erect barriers to entry. 47 U.S.C. § 253(a). It also provides protection for rural companies from some of the Section 251 interconnection obligations. *See* 47 U.S.C. § 251(f).

The statutory process for invoking the protection is well-defined in 47 U.S.C. § 251(f). As acknowledged by witness Staurulakis, a CLEC must first be a certificated carrier before it can request interconnection with an incumbent local exchange carrier, rural or otherwise. Tr. 153 & 161. Once the CLEC proposes an interconnection agreement, the rural telephone company is free to negotiate or invoke its rural exemption. Section 251(f)(1) provides that a rural telephone company is exempt from the obligations under Section 251(c) until it receives a bona fide request for interconnection, services or network elements *and* a state commission determines, pursuant to a petition filed by the CLEC, that the request is not unduly economically burdensome, is technically feasible, and is consistent with Section 254 of the Telecom Act, which addresses universal service. 47 U.S.C. § 251(f)(1)(A). Again, this process is initiated only after the bona fide request made by the CLEC; the rejection of that request by the rural ILEC; and the notice of petition to the state commission by the CLEC. 47 U.S.C. § 251(f)(1)(A) & (B). The state commission then conducts an inquiry to determine whether to terminate the exemption.

In addition to the protection afforded by the exemption, a rural carrier with aggregate installed lines in service that are fewer than 2 percent of the nation's subscriber lines may petition the state commission to suspend or modify the requirements of Section 251 (b) or (c). 47 U.S.C. § 251(f)(2). The commission may grant the petition for such duration as it determines

- (A) is necessary to avoid –
 - (i) a significant adverse economic impact on users of telecommunications services generally;
 - (ii) imposing a requirement that is unduly economically burdensome; or
 - (iii) imposing a requirement that is technically infeasible; and
- (B) is consistent with the public interest.

47 U.S.C.A § 251(f)(2). This Commission concludes that the issue of whether the rural ILECs are entitled to invoke their rural exemption is not before us in this docket. To hold otherwise

would be to obviate this federal statutory scheme created to enhance competition while protecting rural companies.

14. The Commission concludes that the expansion of TWCIS' service area is in the best interests of the citizens of the State of South Carolina. Based upon the testimony provided at the hearing, we conclude that the provision of the proposed services positively impacts the public interest. TWCIS intends to provide competitive services using a new technology in the rural ILECs' service area. Ms. Patterson specifically testified that this technology will allow more enhanced functionalities by integrating telephone service, data services, and cable television services. Thus, the public interest is enhanced, not adversely impacted, pursuant to the evidence.

15. The Commission concludes that TWCIS' certificate of public convenience and necessity should be amended to allow TWCIS to provide local telecommunications services in the service areas of Farmers Telephone, Ft. Mill Telephone, Home Telephone, PBT, and St. Stephen.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED THAT

A. The Application of TWCIS for an amendment to its Certificate to expand into the service areas of the rural ILECs is hereby approved;

B. All reporting requirements and other directives found in Order Nos. 2004-213 and 2004-495 shall remain in full force and effect, unless exceptions are noted above, including, but not limited to those allowing various waivers. TWCIS shall, in addition, file copies of all reports outlined in Order No. 2004-213 with the Office of Regulatory Staff, in addition to filing them with the Commission.

C. TWCIS may continue to operate under the alternative regulatory plan approved in

Order No. 2004-495.

D. This order shall remain in full force and effect until further Order of the Commission.

BY ORDER OF THE COMMISSION:

Randy Mitchell, Chairman

ATTEST:

G. O'Neal Hamilton, Vice-Chairman

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2003-362-C
2004-280-C**

In Re:)
)
Application of Time Warner Cable)
Information Services (South Carolina),)
LLC, d/b/a Time Warner Cable to)
Amend its Certificate of Public)
Convenience and Necessity to Provide)
Interexchange and Local Voice)
Services in Service Areas of Certain)
Incumbent Carriers who Currently)
Have a Rural Exemption)
_____)

CERTIFICATE OF SERVICE

2005 MAY -6 PM 4:04
COMM-FED

This is to certify that I, Mary F. Cutler, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the persons named below the **Proposed Order of Time Warner Cable Information Services (SC), LLC** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211

Dan F. Arnett, Chief of Staff
Florence P. Belser, General Counsel
Benjamin P. Mustian, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC 29211

Dated at Columbia, South Carolina this 6th day of May 2005.



Mary F. Cutler